

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

REV. XIU HUI "JOSEPH" JIANG,

)

)

Plaintiffs,

)

)

v.

)

Case No. 4:15-cv-01008

)

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TONYA LEVETTE PORTER,

)

JAIMIE D. PITTERLE,

)

CITY OF ST. LOUIS, MISSOURI,

)

A.M., N.M., SURVIVORS NETWORK

)

OF THOSE ABUSED BY PRIESTS,

)

DAVID CLOHESSY, and

)

BARBARA DORRIS,

)

)

Defendants.

)

UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO FILE A MOTION TO COMPEL

COMES NOW the SNAP Defendants, and for their Unopposed Motion for an Extension of Time to File a Motion to Compel states as follows:

1. Plaintiff served his interrogatory responses on August 8, 2016 and his request for production responses on August 12, 2016.
2. Under the Court's schedule, a motion to compel regarding these responses is due on August 22 and August 26 respectively.
3. There are outstanding discovery disputes regarding these responses, and the parties are working in good faith to resolve them without the necessity of Court intervention.
4. The SNAP Defendants request an extension up to and including September 9, 2016 to file a motion to compel to allow the parties additional time to hopefully resolve the disputes and cure any deficiencies.

4. This extension will not prejudice any party, and plaintiff does not oppose its entrance. No trial date will be disturbed by the extension.

WHEREFORE, the SNAP Defendants respectfully requests that the Court enter its Order extending the deadline to file a motion to compel until September 9, 2016, and for such other and further relief the Court deems just and equitable under the circumstances.

Respectfully submitted:

CARPENTER MOSER, LLC

/s/ Amy Lorenz-Moser

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*Attorneys for Defendants SNAP, David Clohessy,
and Barbara Dorris*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2016, a copy of the foregoing was electronically filed with the Court, and will be sent electronically by the Court to counsel of Record.

/s/ Amy Lorenz-Moser